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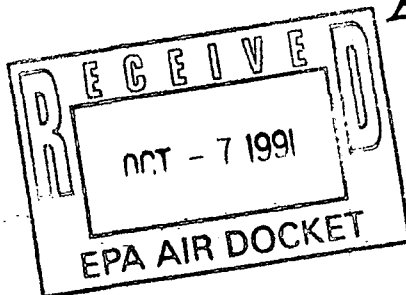
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Dave Kortum
**A-91-46
IV-D-34**

30 September, 1991

The Honorable William K. Reilly, Administrator
Environmental Protection Agency
401 M Street, S.W.
Washington D.C. 20460

Re. Ethyl HiTEC 3000, Docket A-91-46

Dear Bill,

I am concerned that Ethyl Corporation's Application for a fuel additive waiver for Ethyl HiTEC 3000 has again failed to show that MMT will not "cause or contribute" to the failure of emissions control systems.

I use the word "again" because in 1978 Ethyl submitted precisely the identical application and the then Administrator held on 9/11/78 that:

Although not required to do so by the act, I find, based upon our technical and statistical analysis, that MMT has an adverse HC emissions effect at...1/32 grams. manganese per gallon concentrations. This effect was found, with high confidence, for all vehicle groups in EPA's data base. (emphasis added)

Automotive emission technology has not substantially changed since the then Administrator rejected Ethyl's application in 1978.

On September 12, 1991 the Motor Vehicle Manufacturers Association presented, through Dave Kulp of Ford Motor Company, a statement regarding the same shortcoming in Ethyl's HiTEC 3000. Here is the conclusion of MVMA's statement:



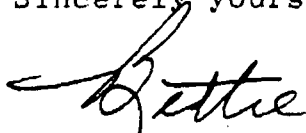
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the same shortcoming in Ethyl's HiTEC 3000. Here is the conclusion of MVMA's statement:

"In conclusion, MVMA believes the Ford test protocol and data more accurately represent the effect MMT has on emission performance in actual customer usage than those of Ethyl's. Ford's data clearly indicate that MMT significantly impairs the performance of emission control devices or systems because it causes and contributes to an HC emission non-compliance condition for the trucks and a significant HC increase for the cars. It is respectfully submitted that Ethyl has failed to provide EPA with data that would enable the Agency to make the required determination."

In view of the consistent findings by EPA and the MVMA that Ethyl's application, if granted, would have an adverse effect on clean air, I urge you to deny Ethyl's request for a waiver.

Sincerely yours,



Beatrice E. Willard, Ph.D.

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